

# PRIVACY NOTICE

21 MAY 2018

Prepared by: Carol Williams ICT Partner

Version: 1.0



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## Version Control

VERSION NO	DATE	AUTHOR	REASON FOR NEW VERSION
1	May 2018	Carol Williams	New Policy

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## INTRODUCTION

This Privacy Statement applies to the use and processing of personal information collected and used by Stiles Harold Williams Partnership LLP (SHW).

By using SHW websites, mobile applications or otherwise providing your personal information to SHW, you agree to the collection, use and sharing of your information in accordance with this statement. Please read this Privacy Statement carefully and [contact us](#) if you have any questions.

Personal information is information, or any combination of separate pieces of information, that could be used to identify you.

## INFORMATION SHW COLLECTS

We may collect information about you from a variety of sources. This includes information we collect directly from you; information we collect when you visit our sites, view our online content or use our mobile applications or other services; and information we collect about you from other sources.

### Information we collect directly from you

We collect information directly from you when you call, email or write to us, use our tenant portal or otherwise provide information directly to us. The following are examples of information we may collect directly from you:

- Name
- Email address
- Postal address
- Username and password
- Telephone and/or fax number
- Date of birth

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- Demographic information
- Payment information (such as a credit card) and bank account details
- Future communication preferences

## Information we collect when you visit our website

We use cookies and other technologies such as Google Analytics to collect information when you visit our website. The following are examples of information we may collect with these technologies:

- a) information about your computer and about your visits to and use of this website, such as your IP address, geographical location, browser type, referral source, length of visit and number of page views;
- b) information that you provide to us for the purpose of registering with us (including your name, Company or employer, email address, telephone number).
- c) information that you provide to us for the purpose of subscribing to our website services, email notifications and/or newsletters (including your name, Company or employer, email address, telephone number).
- d) any other information that you choose to send to us.

## Information SHW Collects from other sources

We may obtain information about you from other sources, including publicly available sources, such as the Land Registry, social media platforms or referral agents, etc. Examples of information we may collect from other sources are:

- Name.
- Postal address.
- Email address.
- Date of birth.
- Publicly observed activities or information made available by you to the public, such as blogs, videos, internet postings, and user generated content.

## HOW SHW USES THIS INFORMATION

We use the information we collect to provide you products and services, to deliver to you advertisements, offers or other content tailored to your interests, and to conduct other SHW business operations. The following are examples of how we may use the information we collect:

- Answer your questions or respond to your requests.
- Develop new products and services.
- Create and manage your account.
- Process payment for purchases or other services.
- Protect against or identify possible fraudulent transactions.
- Send you email and/or postal messages with information about SHW brands and other content we think may be of interest to you.
- Telephone you about SHW's brands and other content we think may be of interest to you.
- Develop and provide Marketing tailored to your interests, including interest-based marketing.
- Analyse the use of, and develop, our products, services and marketing. Enforce our Terms and Conditions and otherwise manage our business.

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- SHW will only process your information in pursuance of our “legitimate interest” if we receive any requests related to, for example, a product or service, a call-back, or specific marketing materials; we will use your personal information to fulfil your request. Where we need to manage your account and protect you against or identify possible fraudulent transactions, we will do so in accordance with our legal obligation placed on us under law. We will seek consent from you if we need to process your data solely identified purposes. To ensure meaningful consent is obtained from you, SHW will provide you with reasonable notice ensuring that your consent is provided on an informed basis.

## Information sharing

The success of our business depends on your trust, and we do not sell your personal information to marketers outside of SHW. We share your personal information within SHW and as described in this statement. We do not share personal information with marketers outside of SHW unless you consent to such sharing, or as described within this statement.

## Co-promotions with Carefully Selected Business Partners

We from time to time may collect personal and other information for a co-promotion or joint program with a business partner and share your information with that business partner. For these programs we will make clear at the point of collection that the information will be shared with SHW and the participating business partner and ask for your consent as required by applicable laws.

## Third-party service providers

We engage third-party service providers to perform a variety of business operations on our behalf. In so doing, we may share your personal information with them. We provide our service providers with only the personal information they need in order to perform the services we request, and we contractually require that they protect this information appropriately and not use it for any other purpose.

For example, we may rely on a 3rd party service provider to:

- Fulfil your service requests and answer your questions.
- Host our sites and deliver our email or other communications.
- Manage payments or take other actions on our behalf.
- Analyse our data, sometimes combined with data from other sources, to send you communications.
- Conduct research and analyse data to improve our products, services and sites.
- Perform other services that we request.

## Other situations

We may transfer or otherwise process your personal information:

- As part of the sale of a SHW brand to another company.
- When we have received your instruction to pass the sale of your property to another agent
- To protect, defend or exercise the rights and property of SHW (including enforcing our Terms and Conditions).
- When required by law and/or government authorities.

## Personal Information Retention Period

We will retain Personal Information for the period necessary to fulfil the purposes outlined in this Privacy Statement, unless a longer retention period is required or permitted by law.

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## Aggregated and non-personal information.

We share aggregated and/or anonymous information that does not identify you for SHW business purposes. For example, we may disclose the number of visitors to SHW sites or services. We may also share aggregated and/or anonymous information with our business partners for their own business purposes.

## YOUR COMMUNICATION OPTIONS

We give you choices about how we communicate with you.

### Email Communications

You can stop receiving promotional email messages from SHW by following the opt-out instructions provided in any such message you receive.

### Postal Mail

You can stop receiving promotional postal mail from SHW by following the opt-out instructions that may be included within those communications.

You can also stop receiving promotional email or postal communication through this Privacy Statement.

### Telephone Marketing

We only send you promotional mobile text messages if you explicitly ask to receive these (you opt in). You can stop receiving promotional text messages by following the instructions to opt out provided within that text messaging program.

PLEASE NOTE: We will honour your request to stop receiving promotional email, text and postal messages from SHW as practicable. However, we may continue to send you service-related communications. We may keep information for record keeping to ensure we fulfil your request not to send particular types of messages.

## YOU AND YOUR INFORMATION

To the extent provided for by applicable law, you have certain rights in respect of the management of the personal data we hold about you.

### Access

We take steps to keep your personal information accurate. Many SHW programs provide access to view or update personal information you provided when you registered online. Check where you registered to learn if you can view or update your information there.

If information access and update are not available where you registered, [click here](#) to select your country and to learn how to access and/or update the personal information you provide to SHW. SHW does not charge for this service and responds to reasonable requests in an appropriate timeframe.

### Data Deletion

To the extent provided by applicable law, you have the right to request deletion of your personal data. Your information will be removed from our live systems subject to relevant legislative obligations which may require us to retain this information

### Other rights

To the extent provided by applicable law, you have the right to request rectification of your personal data; to obtain restriction of the processing of personal data; to object to the processing of personal data (including direct marketing) and to data portability. To exercise any of these rights, please contact us as described below.

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## Consent

Where you have provided consent for our processing of your personal data, you may withdraw that consent at any time by contacting us as described below. We will cease processing your personal data as soon as reasonably practicable following our receipt of your withdrawal.

## Complaints

If you consider that we have processed personal data in violation of applicable law, please contact us as described below. If you consider that we have processed personal data in violation of applicable law and failed to remedy such violation to your reasonable satisfaction, you may also lodge a complaint with a supervisory authority (e.g. the Information Commissioner in the UK).

## COOKIES AND OTHER TECHNOLOGIES

We use cookies on the SHW website. A cookie is a text file sent by a web server to a web browser, and stored by the browser. The text file is then sent back to the server each time the browser requests a page from the server. This enables the web server to identify and track the web browser.

We may send a cookie which may be stored on by your browser on your computer's hard drive. We may use the information we obtain from the cookie in the administration of this website, to improve the website's usability. We may also use that information to recognise your computer when you visit our website, and to personalise our website for you.

Most browsers allow you to refuse to accept cookies. (For example, in Internet Explorer you can refuse all cookies by clicking "Tools", "Internet Options", "Privacy", and selecting "Block all cookies" using the sliding selector.) This will, however, have a negative impact upon the usability of many websites, including this one.

## Other Technologies

In conjunction with gathering information through cookies, web beacons and Javascript, our web servers may log information such as your device type, operating system type, browser type, domain, and other system settings, as well as the language your system uses and the country and time zone where your device is located. We also may record information such as the address of the web page that referred you to our website and the IP address of the device you use to connect to it. We may log information about your interaction with the website, such as which pages you visit.

We may use third-party web analytics services on our website, such as those of Google Analytics. These service providers help us analyse how visitors use the Sites. The information obtained for this purpose (including your IP address and other information collected by automated means) will be disclosed to or collected directly by these service providers.

Please remember that any information you submit or post as user-generated content to Social Media sites become public information. You should exercise caution when deciding to disclose your personal, financial or other information in such submissions or posts. SHW cannot prevent others from using such information in a manner that may violate this Privacy Statement, the law, or your personal privacy and safety. SHW is not responsible for the results of such postings.